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April 4, 2003

The Honorable Ann Veneman
Secretary, U.S. Department of Agriculture
Country of Origin Labeling Program
Agricultural Marketing Service
Stop 0249 Room 2092-S
1400 Independence Avenue, SW
Washington, DC 20250-0249

Dear Secretary Veneman:

First, I would like to see the onerous USDA Voluntary COL Guidelines completely eliminated. Recognizing that this regulation is unconscionable in many respects, I urge you to address the following concerns.

The USDA should work to maintain flexibility in the methods of notification and recognize that COL information can be considered "conspicuous" even if it is a label placed on the back of a random weight package. Furthermore, retailers should not be required to keep two years worth of records for covered commodities at store level.

The USDA also should continue to recognize that prepared foods provided from store delis and salad bars within a retail store are properly considered subject to the statute's exemption from COL for food service establishments.

In addition, the USDA should recognize that retailers have met their obligation to inform the consumer of the country of origin of the covered commodity if the majority of items on display bear country of origin labels, even if some covered commodities in the display do not bear a label.

Finally, I'm reluctant to offer any suggestions on how to make a bad regulation better – I don't know if it can be accomplished. **My strong suggestion is to repeal COL and save the customer the added expense of a program that does almost nothing for them. The COL guidelines certainly are not going to do anything for food safety, but will instead only increase the retail price of food – unnecessarily!**

Sincerely,

Thomas S. Jackson, CAE
President/CEO

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